

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AVELARDO RIVERA and YASMINE
ROMERO, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

AMAZON WEB SERVICES, INC.,
a Delaware corporation,

Defendant.

No. 2:22-CV-00269-JHC

STIPULATED MOTION AND ORDER
MODIFYING DEADLINES

NOTE ON MOTION CALENDAR:
AUGUST 16, 2024

Pursuant to Local Civil Rule 7(d)(1), Local Civil Rule 10(g), and the Court’s July 25, 2024 order modifying deadlines, *see* Dkt. 203, defendant Amazon Web Services, Inc. (“AWS”) and Plaintiffs Avelardo Rivera and Yasmine Romero (“Plaintiffs”) (collectively, the “Parties”), jointly move the Court for a modification of the current discovery and class certification deadlines. In support of this Joint Stipulated Motion, the Parties state as follows:

1. On July 25, 2024, the Parties filed a joint stipulated motion to modify the schedule in this case, which the Court granted. *See* Dkt. 203 (the “Order”).

2. On August 8, 2024, consistent with the Court’s Order, Plaintiffs served on AWS supplemental responses and objections to AWS’s written discovery requests, informing AWS of the class Plaintiffs intend to seek certification of (the “August 8 Class Definition”).

3. In light of Plaintiffs' disclosure of the August 8 Class Definition, and consistent with the Order, the Parties respectfully request that the current case schedule be modified as follows:

Event	Current Deadline	Proposed Deadline
Deadline for AWS to conduct party and third-party fact discovery related to AWS's class certification defenses and the August 8 Class Definition	N/A	October 14, 2024
Deadline for Plaintiffs to conduct third-party fact discovery related to AWS's class certification defenses and the August 8 Class Definition	N/A	October 14, 2024
AWS's expert disclosures regarding class certification issues	Stayed	December 13, 2024
Plaintiffs' rebuttal expert disclosures regarding class certification issues	Stayed	February 11, 2025
Completion of expert discovery regarding class certification issues	Stayed	March 31, 2025
Parties' deadline to file <i>Daubert</i> motions regarding class certification experts	Stayed	May 15, 2025
Plaintiffs' deadline to file motion for class certification	Stayed	May 15, 2025

AWS's deadline to respond to motion for class certification	Stayed	June 26, 2025
Plaintiffs' deadline to reply in support of class certification	Stayed	July 24, 2025
Parties' deadline to file joint status report to propose post-class certification deadlines	Fourteen (14) days after Court's ruling on motion for class certification	Fourteen (14) days after Court's ruling on motion for class certification

WHEREFORE, the Parties respectfully request that the Court enter an order modifying the current case deadlines in accordance with this Joint Stipulated Motion.

Dated: August 15, 2024

By: /s/ Ryan Spear

Ryan Spear, WSBA No. 39974
 RSpear@perkinscoie.com
 Nicola Menaldo, WSBA No. 44459
 NMenaldo@perkinscoie.com
Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, Washington 98101-3099
 Telephone 206.359.8000
 Facsimile 206.359.9000

Attorneys for Defendant
 AMAZON WEB SERVICES, INC.

By: /s/ Schuyler Ufkes

J. Eli Wade-Scott (admitted *pro hac vice*)
 ewadescott@edelson.com
 Schuyler Ufkes (admitted *pro hac vice*)
 sufkes@edelson.com
 EDELSON PC
 350 North LaSalle Street, 14th Floor

Chicago, Illinois 60654

Tel: 312.589.6370

Fax: 312.589.6378

Attorneys for Plaintiffs

AVELARDO RIVERA AND

YASMINE ROMERO

LCR 7(e) Certification

LCR 7(e) Certification I certify that this memorandum contains 362 words, in compliance with the Local Civil Rules.

/s/ Ryan Spear

ORDER

IT IS SO ORDERED.

DATED this 16th day of August, 2024.

A handwritten signature in cursive script, reading "John H. Chun", is positioned above a horizontal line.

JOHN H. CHUN

UNITED STATES DISTRICT JUDGE